

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

U.S. DISTRICT COURT
EASTERN DISTRICT - WI
FILED

UNITED STATES OF AMERICA,

2021 MAR -2 P 4: 57

Plaintiff,

CLERK OF COURT

v.

JAQUELL L. JONES,

Case No. 21-CR-

[18 U.S.C. §§ 922(g)(1), 924(a)(2) &
924(c); 21 U.S.C. §§ 841(a)(1) &
841(b)(1)(C)]

Defendant.

INDICTMENT

21-CR-049

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. On or about August 2, 2020, in the State and Eastern District of Wisconsin,

JAQUELL L. JONES,

knowing he previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm which, prior to his possession of it, had been transported in interstate commerce, the possession of which was therefore in and affecting commerce.

2. The firearm is further described as a Taurus, model G2C, 9mm pistol, bearing serial number TMS51129.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 2, 2020, in the State and Eastern District of Wisconsin,

JAQUELL L. JONES

knowingly and intentionally possessed with intent to distribute a mixture and substance containing heroin, a Schedule I controlled substance, and a mixture and substance containing cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 2, 2020, in the State and Eastern District of Wisconsin,

JAQUELL L. JONES

knowingly possessed a firearm in furtherance of the drug trafficking crime charged in Count Two of this Indictment.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

FORFEITURE NOTICE

Upon conviction of the offense in violation of Title 18, United States Code, Section 922(g)(1) set forth in Count One of this Indictment or Title 18, United States Code, Section 924(c) set forth in Count Three of this Indictment, the defendant, Jaquell L. Jones, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in the knowing violation of Sections 922(g)(1) or 924(c), including, but not limited to: a Taurus, model G2C, 9mm pistol, bearing serial number TMS51129.

A TRUE BILL:

[REDACTED]

FOREPERSON

Date: 3/2/2021

fw Richard G. Frohling
RICHARD G. FROHLING
Acting United States Attorney